

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

CHARLES WIGGS and
JUDY WIGGS,

PLAINTIFFS,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

DEFENDANT.

Case No. 09-00611 DSD-FLN

**DECLARATION OF YVONNE M. FLAHERTY IN SUPPORT OF
PLAINTIFFS' BRIEF ON 28 U.S.C. § 1404(a) TRANSFER
IN RESPONSE TO COURT'S *SUA SPONTE* ORDER**

I, Yvonne M. Flaherty, being first duly sworn on oath, depose and state as follows:

1. I am a partner at Lockridge Grindal Nauen P.L.L.P. and Counsel for Plaintiffs in the above-captioned matter.
2. I submit this Declaration in Support of Plaintiffs' Brief on 28 U.S.C. § 1404(a) Transfer.
3. Attached as Exhibit 1 is a true and correct copy of a Memorandum Opinion and Order dated October 12, 2010 in *Burnett v. DJO, et al.*, Court File 10-708 (PAM/JJK) (D. Minn.).
4. Attached as Exhibit 2 is a true and correct copy of a March 1, 2011 Order in *Welch v. Wyeth LLC, et al.*, Court File 04-3973 (PAM) (D. Minn.).

Dated: April 25, 2014

s/ Yvonne M. Flaherty